



## **CPR QS3: Admission**

### **1. Introduction**

This document sets out the Navitas policy and procedure for admission and the entry for undergraduate students. The Admissions and Recruitment Centre (ARC) undertakes admission of all Navitas students alongside the Colleges and whilst some processes may require significant liaison with the Partner University, the Admissions and Recruitment Centre own the policy and process.

There are a number of documents and processes that link directly to this policy, however because of the variation across the group and the requirement for flexibility due to the changing nature of the regulatory framework, these documents sit outside the policy [see the appendices below for details of these documents]. The policy should always be read and used in conjunction with the documents listed or referenced below.

Appendix A – Academic Entry Requirements

Appendix B – English Entry at Non-SELT

Appendix C – CMT Recommendation Template (Non Standard Application Form)

Appendix D – Visa Refusals and Administrative Review

Appendix E – CAS issuance and Risk Management

### **2. Principles of Admission**

2.1 The admission of individual applicants is at the discretion of the College with entry levels and other regulatory requirements agreed in principle with the partner University. These will be unique to each College, but are referenced below as Appendix A – [Academic Entry Requirements].

2.2 In exercising this discretion, the College and/or Admissions and Recruitment Centre will abide by the following principles:

2.2.1 There should be a reasonable expectation that any person admitted to a pathway of study has the potential to achieve the standard prescribed in the 'progression criteria' at each stage of that pathway. Further, that there should be reasonable expectation that such persons are able to fulfil the objectives of the degree award and that this achievement be sequential.

2.2.2 Where applications do not directly meet normal stated entry criteria or where there are regulatory, migratory or other requirements to consider, the College/Admissions and Recruitment Centre reserves the right to review such applications as 'Non-standard' [see below for the policy on 'Non-standard' applications].

2.2.3 When considering each individual applicant for admission to a pathway of study, in addition to the entry criteria, evidence may be sought as to the applicant's personal, professional and educational experiences that provide indications of his or her ability to meet the demands and inherent benefits of the pathway.

2.2.4 Both the Admissions and Recruitment Centre and the College endeavour to ensure that no applicant is discriminated on the grounds of race, colour, nationality, ethnic or national origin, marital status, disability, age, gender, sexuality, political or religious beliefs. To this end, the College, in association with the Admissions and Recruitment Centre and each partner university, ensures that the criteria and procedures used for selecting students are relevant to the requirements of the pathway and in no way unjustly disadvantage such applicants. The College and Admissions and Recruitment Centre will consider all applications in accordance with both the Disability Act, 1995 and The Equality Act, 2010 and all associated guidance [see below for policy on 'Non-standard' applications].

2.2.5 The College and Admissions and Recruitment Centre reserves the right to consider in greater detail, applications from persons who have a criminal record in either the UK, in their country of origin or elsewhere [see below for policy on 'Non-standard' applications].

2.2.6 Admission with exemption and/or based on prior experience will be governed by the same principles as those applying to applicants seeking admission to the beginning of a pathway of study [see below for policy on 'Non-standard' applications].

2.2.7 When making an offer (conditional or unconditional) in response to an application and having due regard to all entry requirements (academic and otherwise), any such offer will be for the entire undergraduate degree pathway. This does not preclude the possibility that the offer may require the applicant to obtain more than one Confirmation of Acceptance of Study (CAS) and, in the event that more than one CAS is required, either the College or the University as a Tier 4 sponsor might issue each.

### **3. Code of Ethics**

3.1 All Navitas agents, Navitas UK representatives and College staff, when considering applicants for entry into the UK, must adhere to the Code of Ethics as laid down by UKCISA and these can be found on UKCISA's website.

3.2 Further to this, all College staff must sign up to the Navitas UK Code of Ethics Agreement, which is based on the UKCISA expectations above. This is to assure appropriate quality and rigour towards the recruitment of international students and their ongoing administration and management, inclusive of the application of objectivity, equality, parity and transparency. The Quality and Standards Office, UK requires that the following standards are applied at all times to the recruitment and application processes.

3.2.1 All staff act in the best interests of the applicant, while respecting College, Navitas Ltd, Navitas UK and institutional policies and regulations, statutory and legal requirements and the legitimate interests of the financial sponsors of students.

3.2.2 The Marketing and Recruitment Team and College Admissions Office/Admissions and Recruitment Centre recognise the power of influence that comes with their position and that it is not used inappropriately. The Director of Marketing and Admissions (DMA), Director of the Admissions and Recruitment Centre (DARC) and the College Director/Principal (CD/P), should monitor assurance of this message and its application to second and third parties.

3.2.3 All College/Admissions and Recruitment Centre staff and authorised representatives reflect accurately their areas of competence, education, training and experience and recognise the boundaries of their qualifications and competence, making appropriate referrals when situations fall outside them, specifically by referring 'Non-standard' applications [see below for policy on 'Non-standard' applications]. The College Director/Principal (CD/P), Director of the Admissions and Recruitment Centre (DARC) and the Director of Marketing and Admissions (DMA), are responsible for assuring that this standard is met.

3.2.4 The CD/P, DARC and DMA must actively seek to promote their professional development and that of the marketing and recruitment team and Admissions staff. They must keep pace with current developments in recruitment practice, legislation, statutory case law, immigration rules and procedures, Quality and Standards Office UK policies and guidance, along with guidance from authorities, such as the Home Office. They should inform the Quality and Standards Office UK of any proposed changes and maintain operating standards and compliance requirements, with a view to enhancement.

### **4. Annual Monitoring**

4.1 Academic standards and the quality of provision offered by the College is assessed, maintained and enhanced by the Annual Monitoring process and this is detailed in CPR QS2.

### **5. Non-standard applications**

5.1 As noted throughout this document, applications may be considered as 'Non-standard' due to a number of reasons and these may be, but are not limited to, reasons associated with; academic entry requirements, regulatory compliance, equality and diversity, and any other requirements, which may affect the applicant's chosen course of study such as professional membership criteria.

5.2 All such applications should be referred to the DARC and College Academic Board for consideration and possible onward referral to the university Registry or Admissions office.

5.2.1 The College Academic Board is the mechanism by which each application, not meeting the standard entry requirements and/or requiring consideration because of other criteria, should be reviewed and this review should occur before the issuance of any offer (conditional or unconditional).

5.2.2 Its membership should include the CD/P; DMA and a member of the College team with sufficient compliance knowledge and understanding to review all the regulatory requirements (in instances where there is insufficient personnel available the case should be referred to the Quality and Standards Office UK.).

5.2.3 The authority under which the Academic Board operates is the College Learning and Teaching Board (CLTB). The Academic Board may exercise its oversight via CMT Chair's Action.

5.2.4 All cases considered by the Academic Board should be fully noted [Academic Board – Appendix C] and should be submitted to the CLTB for recording on the minutes.

5.2.5 Should a case require onward referral to the university Registry, this should be recorded in the notes of the Academic Board and no decision made until such time as the university Registry returns.

5.3 Those applications considered as 'Non-standard' could be included under one of the following categories:

- i. Academic Entry (those falling below entry and those requiring consideration of Accredited prior learning or Admission with Exemption)
- ii. Regulatory (Immigration)
- iii. Equality and diversity (disability or additional learning needs)
- iv. U18 Minor
- v. Criminal record and persons at risk

#### 5.3.1 Academic Entry

Where an applicant marginally does not meet the stated entry standards, however demonstrates abilities and aptitudes that can be mapped as appropriate for entry to a stage of study, these applicants are eligible for referral to the Academic Board and consideration for admission, given that the stage of study in question is designed to incorporate:

- i. appropriate teaching support via enhanced contact hours; or is to be
- ii. delivered over a longer period of time to enable adjustment to mature learning processes.

However, these applicants are not guaranteed to be successful in securing an offer of admission and may also require onward referral to the partner University for approval.

5.3.2 Those applicants where their prior qualifications and learning are accepted as fulfilling some of the requirements of the proposed pathway or course of study may be eligible for exemption either through the Accreditation of Prior Learning (APL) through experience or by qualification.

5.3.2 The awarding of APL is a recognised route of entry to the College and should be formally referred to the Academic Board as a 'Non-standard' application.

5.3.3 The CLTB delegates responsibility for the formal approval, to the Academic Board, of an applicants' prior learning and experience and for determining the amount of credit that an applicant might be permitted.

5.3.4 All CLTBs and Academic Boards are required to follow the guidelines published by the Quality Assurance Agency (QAA) and specifically here this refers to Chapter B6: Assessment of students and accreditation of prior learning.

5.3.5 The following general guidelines should also be considered when making decisions about APL:

- i. It is clearly demonstrated that an applicant has fulfilled some of the assessment requirements of the designated pathway or course of study by means other than attendance on that course;
- ii. That by completing the remaining requirements of the designated stage of study or course, the applicant will be able to fulfil the objectives of the course or pathway and attain the prescribed standard for successful completion and onward progression to the partner University;
- iii. That there are no constraints placed by external bodies; and
- iv. APL cannot be granted to the modules Interactive Learning Skills and Communication.

5.3.6 The College places an equivalent credit limit on the proportion of learning that can be recognised through APL. These are as follows:

Pathway Title	Delivery Model	Stage of Study Credit Points (maximum)	APL Credit Points / Modules (maximum)
Undergraduate Pathway Stage 1	SDM	120+	60 or four (4) modules

## **APPENDIX A**

### **Academic Entry Requirements**

The link below provides guideline to the academic requirements for entry into LGSC's Stage 1 programs. LGSC welcomes all applications from all countries, and will assess each application on its own merit.

Whilst for most of our courses we do not have subject specific requirements, we will assess the subjects that a student has previously studied that are related to the degree chosen to ensure that the applicant has sufficient subject specific ability.

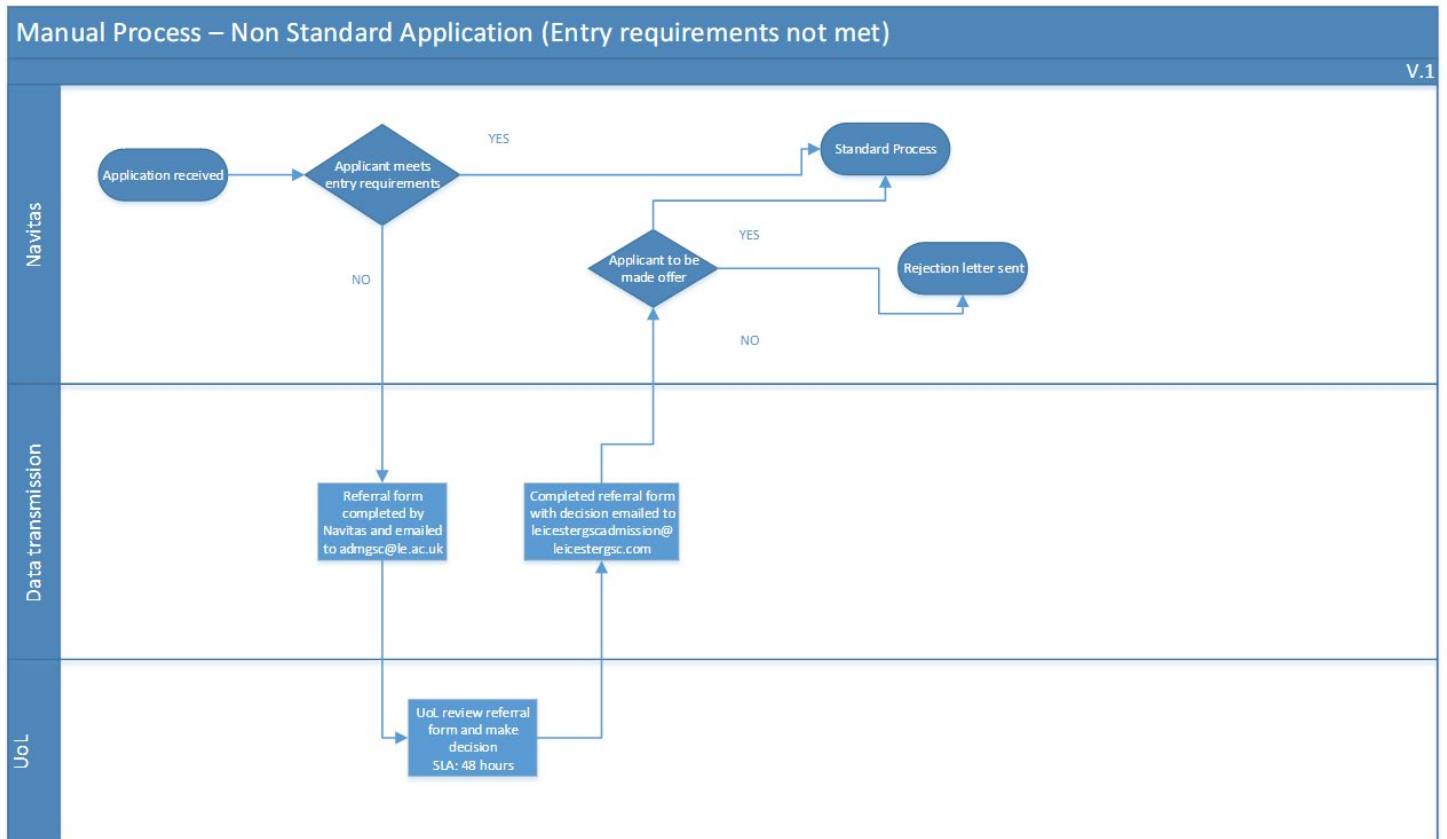
<https://www.leicestergsc.com/entry-requirements>

## APPENDIX B - English Entry at Non-SELT

Qualification	IELTS equivalent	Comment
GCSE English Language	C	
A-level English Language	C	
AS-level English Language	C	
Cambridge O-level	C	
Cambridge International GCSE, English as First Language (syllabus 0500)	C <sup>1</sup>	
Cambridge International GCSE, English as First Language (syllabus 0522)	C	
Cambridge International GCSE, English as Second Language (syllabus 0510)	B <sup>2</sup>	
Cambridge International GCSE, English as Second Language (syllabus 0511)	B	
Scottish Advanced Higher or Higher English	C	
Irish Leaving Certificate (pre-2017)	C	
Irish Leaving Certificate (2017 onwards)	O4/H4	
International Baccalaureate	4 in SL EL	
Country	Qualification	IELTS equivalent
Brunei	GCE/O-level 1120 Syllabus	C
Cameroon	GCE O-level English	C
Hong Kong	HKDSE	Grade 3 (IFY) Grade 4 (IY1) <i>Accepted under Language of Instruction: English</i>
Hong Kong	HKAL	C
India	National Board Standard XII	70%
India	State Board Standard XII	80%
Kenya	KCSE	<i>C Accepted under Language of Instruction: English</i>
Malaysia	English Language GCE-O (Syllabus 1119)	C
Mauritius	Cambridge Overseas Schools (COS), English	C
Namibia	HIGCSE	C
Nigeria	WAEC	C6
Nigeria	NECO	Not accepted. <i>[April 2019: Business case to be submitted]</i>
Sri Lanka	O-level in English	Credit
South Africa	National Senior Certificate	Grade 4
USA	High School Diploma	Completion

# Appendix C – CMT Recommendation Template

## Non-Standard Process



## Non-Standard Application Record

<b><u>Student Name and ID</u></b>	
<b><u>Business Unit</u></b>	LGSC
<b><u>Country of Recruitment</u></b>	
<b><u>Course and Stage</u></b>	<b>Course Name</b> Stage <input type="checkbox"/> 1- Foundation <input type="checkbox"/> 2- First Year <input type="checkbox"/> PMP Intake <input type="checkbox"/> 01 <input type="checkbox"/> 02 <input type="checkbox"/> 03
<b><u>Previous RQF Level (if applicable)</u></b>	<input type="checkbox"/> CEFR B2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> Unknown <input type="checkbox"/> Other, please explain:
<b><u>The student's situation</u></b>	<input type="checkbox"/> <b>1. Qualification held is not on published requirements</b> <input type="checkbox"/> 1.1 NARIC gives equivalence to entry requirements (please attach a screenshot from NARIC)  <input type="checkbox"/> <b>2. Final grades (or subject grades) are slightly lower than the entry requirements</b>  <input type="checkbox"/> <b>3. Unsuccessful previous UK studies</b> <input type="checkbox"/> 3.1 UK foundation – failed one or more modules and overall <input type="checkbox"/> 3.2 UK foundation – failed one or more modules but passed overall <input type="checkbox"/> 3.3 UK foundation – passed all modules but failed to progress <input type="checkbox"/> 3.4 UK First Year – Failed one or more modules  Please provide further information on the previous UK studies here:  <input type="checkbox"/> <b>4. Other, please explain:</b>
<b><u>Is the student qualified for the applied stage with home qualifications?</u></b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b><u>Supporting evidence</u></b>	
<b><u>Previous precedents</u></b>	
<b><u>What is proposed?</u></b>	Can the student be accepted to the course and stage stated above?
<b><u>Justification</u></b>	
<b><u>Sign-off</u></b>	<b>Admissions:</b> _____ <b>Compliance (if applicable):</b> _____

## **Appendix D – Visa Refusals and Administrative Review**

### **Introduction**

This document sets out the Navitas policy and procedure when, following a visa refusal, the College and/or student consider there are possible grounds for seeking an Administrative Review of the refusal decision. All Colleges should undertake this procedure, however some processes may require significant liaison with the Partner University (especially where they are the Tier 4 Sponsor). The individual College Process is noted below in section 8.

This policy and process is owned by the College, however there will be clear operational procedures which will require liaison with the University.

There are a number of documents that should be considered when following this process, and these include:

- Tier 4 Policy Guidance for Sponsors;
- Tier 4 Policy Guidance for Applications;
- The Immigration Rules, as amended; and
- Tier 4 interviews and genuine student rule (GSR): STY02.

All of these documents can be found on the Home Office section of the UK Government website.

### **2. Principles of Administrative Review**

2.1 Administrative Review is the means by which a student can challenge a refusal decision made under the Points Based System, where the student believes an error has been made in the decision. The Administrative Review is free of charge.

2.2 Administrative Review is an entitlement but the request must be made within 28 days from the date the refusal notice is received by the student. For time limits for making a request, see further paragraphs 6 and 7 below.

2.3 Administrative Review is a non-statutory scheme; that is there is no legislation setting out what it covers or who is eligible to apply. The policy is contained in the Tier 4 Policy Guidance for Applications.

2.4 An Entry Clearance Manager will conduct the Administrative Review. This may mean that in some cases an Entry Clearance Manager from another entry clearance post will conduct the Administrative Review. The applicant may receive the result of the Administrative Review from an entry clearance post that is different to the one that considered the original entry clearance application.

2.5 Any applicant refused entry clearance under Points Based System, where they believe the Entry Clearance Officer has made an incorrect decision.

### **3 The Tier 4 Process of Administrative Review**

3.1 The student will receive the Administrative Review Request Notice with the entry clearance refusal notice.

3.2 The student must complete the Request Notice in full and send it directly to the address stated on the Request Notice.

3.4 Students must not send any additional documents such as passport or supporting documents with the Administrative Review request notice. If the refusal is subsequently overturned, the student will be asked to send in their passport.

3.5 The student has 28 days from the date of receipt of the refusal notice, to submit a request for Administrative Review; however,

3.5.1 Where an Administrative Review request is received outside the 28-day period, the administrative reviewer will consider if there are exceptional circumstances to accept the application outside of the deadline; and

3.5.2 If the Administrative Review request is late and the administrative reviewer decides not to perform the Administrative Review, the request notice will be returned to the applicant with a letter explaining why it is not being accepted.



3.6 Applicants may request only one Administrative Review per refusal decision. Any further review requests received for the same refusal decision will not be accepted. They will be returned to the applicant; however,

3.6.1. Where the Administrative Review upholds a refusal but with different refusal grounds, the applicant may request an administrative review of these new refusal grounds.

3.7 If the applicant has new or further information, documents or other paperwork that they failed to submit with their original application, they will need to make a new application and pay the appropriate fee.

3.8 The administrative reviewer will complete their review and notify the applicant in writing of their decision within 28 days from the date of receipt of the Administrative Review request notice; however if, in exceptional circumstances, the administrative reviewer is unable to complete the Administrative Review within the 28 days, they will notify the applicant in writing as to when to expect a decision.

#### **4 What will the Administrative Review consider?**

4.1 The administrative reviewer will examine the evidence submitted with the original application, copies of which will be kept at the refusal post.

4.1.1 The applicant is not allowed to provide new evidence. Any new evidence must be disregarded unless the applicant was refused under paragraph 320 (7A) or 320 (7B) of the Immigration Rules on General Grounds for Refusal.

4.1.2 Any new evidence submitted by the applicant must be returned to them together with the outcome of the Administrative Review.

4.2 More detail on the process and decision making processes of Administration Reviews can be found in the Tier 3 Policy Guidance for Applications.

#### **5 Reasons for a Navitas student to consider Administration Review and possible outcomes**

5.1 A student should consider an Administration Review in one of the following cases, where the ECO:

5.1.1 Failed to properly consider evidence submitted with the original application;

5.1.2 Failed to apply the Immigration Rules correctly;

5.1.3 Made a mistake in processing the application; and

5.1.4 Failed to give adequate reasons for refusing entry clearance. In this case, the administrative reviewer will recommend the Entry Clearance Officer revoke the original refusal and serve a new refusal notice giving a full explanation for the refusal.

5.2 There are three possible outcomes of Administrative Review:

5.2.1 Uphold decision - reasons for refusal remains the same;

5.2.2 Uphold decision - with revised reasons for refusal; and

5.2.3 Overturn decision - issue entry clearance.

#### **6 Credibility Refusals**

6.1 These refusals are more difficult to challenge through Administration Review than those relating to documentation issues or failures in the application process. Therefore this sets out some additional considerations.

6.2 The current caseworker guidance is referenced below and should be considered carefully when all refusals from credibility are reviewed by the College. There are a number of areas where it is specifically noted that a caseworker cannot refuse on the grounds of credibility (Genuine Student Rule – 245ZV(k)); these are:

6.2.1 Academic ability, as assessed by the ECO;

6.2.2 Academic progress, as assessed by the ECO;

6.2.3 The relative cost of the course and whether it is available more cheaply in the country of application;

6.2.4 The relevance of the course to future employability; and

6.2.5 Whether the student intends to leave the UK at the end of the course.

6.2.6 In addition, applications should not be refused on the grounds of credibility without an interview unless the applicant has previously been refused for not being 'genuine' and the new application shows no material change of circumstance or no new evidence, or if other applicants have made the same or similar applications and have all been refused for not being 'genuine'. If any of the above applies, then the student (and College) should consider going for an Administration Review or assigning another CAS. There are some considerations; however that need to be ensured if either of these are being pursued.

#### **7 Processing a credibility Administrative Review**

7.1 If considering an Administrative Review, it is possible and recommended to request the interview transcript (this has to be done by the student\*);

7.2 This transcript then should be reviewed before the Administration Review is submitted (there are time constraints on submitting as noted above, so action needs to be taken promptly);

7.3 Current legal advice also recommends that if a College clearly considers this applicant to be genuine, then they should also submit a covering letter to support this application for Administrative Review.

\* A new declaration has been added to the Acceptance of Offer whereby the student consents to the College/University contacting the UKVI in matters relating to the student's immigration status.

7.4 Please contact the Head of Compliance Services if you are considering either an Administration Review or a second CAS for a student who has received a refusal on the grounds of credibility and you require further guidance.

## **8 College Process flow for Administration Review**

8.1 When a Visa Refusal is received the receiving member of staff must complete appropriate fields in Navigate. This is to be presented to the next College Management Team Meeting.

8.2 On review by the College Management Team the receiving member of staff will be notified as to whether the student should pursue an Administrative Review. If an Administrative Review is recommended the relevant Marketing Manager and the Admissions Coordinator are responsible for notifying the agent and the student, and supporting the student through the process.

8.3 The Admissions Coordinator will follow-up on the progress of the Administrative Review every week. Once a decision is received (positive or negative) the College Management Team should be informed.

## Appendix E – CAS issuance and Risk Management

### 1. Introduction

This document sets out the Navitas UK policy, and provides further information to support the College procedure when considering the assignment of a CAS and in this the assessment of the associated risks. This is designed so that the College can ensure that it continues to meet both its regulatory objectives and broader legal obligations including those outside of immigration e.g. The Equality Act, 2010.

The individual College Strategy and Procedure is noted below in section 6.

This policy and associated procedure is prescribed by Navitas UK and owned by the College, however there will be clear operational procedures, which will require liaison with the partner university.

There are a number of external documents that should be considered when following this and any risk management process associated with the assignment of a CAS, and these include:

- Tier 4 Policy Guidance for Sponsors;
- Tier 4 Policy Guidance for Applicants;
- The Immigration Rules, as amended; and
- Tier 4 interviews and genuine student rule (GSR): STY02; and
- The Equality Act, 2010.

All of these documents can be found on the Home Office and legislative sections of the UK Government website.

### 2. Principles of Sponsorship and issuing a CAS

2.1 Paragraph 1 of the Tier 4 Points Based System Guidance for Sponsors states that:

*Sponsorship is based on two basic principles. They are that those who benefit most directly from migration (employers, education providers or other bodies that bring in migrants) help to prevent the system being abused; and those applying to come to the UK to work or study are eligible to do so and a reputable employer or education provider genuinely wishes to take them on.*

2.2 As part of these obligations is it essential that a CAS be assigned only to those students who are eligible and this requires that an assessment of the 'credibility' of the student and their application to study be carried out; the Home Office and Immigration Rules refer to this as assessment under the 'Genuine Student Rule'. More information on assigning a CAS can be found in the above documents.

### 3 HTS Metrics and Risk Management

3.1 Institutions licensed under Tier 4 are required to apply for and renew their HTS status annually. Within this application they are assessed against and are required to meet certain metrics, these are visa refusal rate, enrolment rate and completion rate. Current definitions of these can be found in the Tier 4 Points Based System Policy Guidance documents.

3.2 In order that these HTS metrics are met, the College needs to ensure that the recruitment, admission and on-going management of students is considered carefully as part of the on-going overall risk management strategy of the College. Failure to meet any of the HTS metrics in their own right will result in an automatic suspension and then revocation of an institution's licence.

3.3 Each College should consider how its recruitment strategy, forward projections through the financial planning process, current admission verification and student management compliance systems all combine to ensure that the on-going regulatory risk is minimised, whilst maximising the opportunity for sustainability and future growth of the business. **CPR QS3 version 3.15 38 | Page**

3.4 When conducting this overall risk management approach to the HTS metrics it is important to ensure that Colleges and individuals adhere to and remain compliant with all other UK law including, but not limited to, the Equality Act, 2010.

#### **4 The requirements of the Equality Act, 2010**

4.1 The Equality Act, 2010, amongst other aspects, statutes to protect individuals against discrimination, both direct and indirect. It also defines a number of 'protected characteristics' and details how these are to be considered.

4.2 It is important when determining the risk of regulatory breach under Tier 4 that the decision making processes consider the requirements of the Equality Act, 2010 and that the provisions of paragraph 2.2.4 in the NPR QS3 Admission policy are adhered to in full.

#### **5 Reasons for refusing the issuance of a CAS**

5.1 Each and every application from a prospective student should be considered on their academic merits, taking into account the requirements for entry, the Tier 4 Points Based System Policy Guidance for Sponsors and the QAA UK Quality Code for Higher Education, Chapter B2 – Recruitment, selection and admission into Higher Education.

5.2 There are many considerations when determining the issuance of a CAS, not least those listed within the Guidance and documents above.

5.3 One of the conditions within the Acceptance of Offer and to which all students agree is:

"I understand that this offer, whilst unconditional, can be withdrawn by the College at an time before I accept it, in particular in the event that the College/University Partner deems that by continuing to support the offer either party could be in contravention of UK law and/or that I may not be successful in my visa application"

This condition protects the College, as far as it can under the law, in any decision following the student's acceptance of an unconditional offer, where the College determines not to issue a CAS to a student. Not with standing, this decision cannot be made on any grounds where the determination may be considered to be in breach of the Equality Act, 2010.

5.4 Any decision to issue or not, a CAS should be made solely on the grounds of whether:

5.4.1 The prospective student meets the applicable entry requirements (e.g. academic, English Language level and suitability to their chosen course of study); and/or

5.4.2 The prospective student meets the requirements of the Immigration Rules and any associated guidance e.g. is a genuine student; and/or

5.4.3 Where by assigning a CAS or not, this might bring the College in breach of its obligations under UK law, now or knowingly in the future.

#### **6 College Risk Management Strategy and Processes**

HTS statistics are monitored on a weekly basis at the College Management Team meeting. Where areas of risk are identified (i.e. if the College reaches an HTS metric of 5%) action is taken to mitigate that risk. Areas of analysis include Visa Refusals, Non-Enrolments, Programme Completion and Withdrawals split by country, agent, UK domicile, and Sponsor Licence Number. A full report on HTS metrics and risk mitigation is provided to the Executive General Manager UK on a semesterly basis.

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